

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60001-Cr-Cooke (s)(s)(s)(s)(s)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ADHAM AMIN HASSOUN,

Defendant.

NIGHT BOX
FILED

JUN 30 2006

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI

DEFENDANT ADHAM AMIN HASSOUN'S NOTICE OF FILING PRELIMINARY
DRAFT OF JURY QUESTIONNAIRE

The defendant, ADHAM AMIN HASSOUN, through undersigned counsel, submits his draft of the Jury Questionnaire. This questionnaire is being filed in compliance with the court's schedule for filing the Jury Questionnaire, though it is presented in draft form. Due to the extensive scope of the matters to be covered in this questionnaire and the time requirements for preparing the defendant's Jury Questionnaire, the defendant has not has an opportunity to confer with the government regarding this draft.

Respectfully submitted,

KENNETH M. SWARTZ
SWARTZ & LENAMON
New World Tower, Suite 2100
100 North Biscayne Boulevard
Miami, Florida 33132
Tel: 305-579-9090

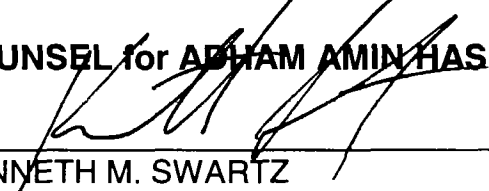
JEANNE BAKER
ATTORNEY AT LAW, P.A.
Grove Forest Plaza, Suite 202
2937 Southwest 27th Avenue
Miami, Florida 33133-3703
Tel: 305-443-1600

463
/BA

Fax: 786-425-2380
Florida Bar No. 331929

Fax: 305-445-9666
Florida Bar No.0880700

COUNSEL for ABHAM AMIN HASSOUN

By: 
KENNETH M. SWARTZ
Florida Bar No. 331929

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail this 1st day of July, 2006, upon Russell Killinger, Assistant United States Attorney, 99 N. E. Fourth Street, Miami FL 33132, William W. Swor, 3060 Penobscot Building, 645 Griswold St., Detroit, Michigan 48226, Michael Caruso, Assistant Federal Public Defender, 150 W. Flagler Street, Suite 1700, Miami, FL 33130, and Andrew Patel, 111 Broadway, 13th Floor, New York, N.Y. 10006.


Kenneth M. Swartz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60001-CR-COOKE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADHAM AMIN HASSOUN,
MOHAMED HESHAM YOUSSEF,
KIFAH WAEI JAYYOUSI,
KASSEM DAHER and
JOSE PADILLA,

Defendants.

JUROR QUESTIONNAIRE

General Instructions:

The questions on this form are asked to help the Court and the attorneys learn about your views on issues that may be related to this case. Its use will expedite the process of selecting a jury. The questions are not meant to invade your privacy, but to help select the best possible jury for this case. If there is any reason why you might not be able to give both sides a fair trial in this case, it is important to say so. Please answer each question as fully as you can. Your complete honesty is essential. Because the questionnaire is part of the jury selection process, the questionnaires are to be answered under your oath as a prospective juror to tell the truth. If you think an answer is too personal, please say so in the space provided. You will have an opportunity to discuss your answer privately. If a question does not apply to you in any way, write N/A (Not Applicable), rather than leave the question blank.

Please keep in mind that there are no right or wrong answers. We only request that your answers are honest and complete. If you do not understand a question, need more space for your response, or wish to make further comments about any question, please use the extra sheet attached to the back of the questionnaire. You are instructed not to discuss this case or questionnaire with anyone, including your family or fellow jurors. It is important that your answers be your own.

The case for which you are being questioned is United States of America v. Adham Amin Hassoun, et al. In this case there are five defendants against whom the government has brought charges of having been part of a conspiracy to provide material support to or for the benefit of

persons who, it is alleged, agreed to commit murder, kidnaping, and maiming in foreign countries as well as other related federal crimes. Of course, the bringing of charges is not evidence of guilt. Each of the accused is entitled to a presumption of innocence and the case against each must be decided individually.

Because there has been a high degree of publicity about this case and some of its participants, the court has directed that this juror questionnaire be sent to you. Thank you for your cooperation.

Participant No. _____

Juror No. _____

JUROR QUESTIONNAIRE
(Please **PRINT** your answers in **INK**)

JUROR'S OATH:

I declare under penalty of perjury that the information which I have provided in this juror questionnaire and any attachments is true and correct. I further declare that I have completed this questionnaire without anyone's assistance.

Juror NUMBER (not your name)

Date

HARDSHIP QUESTION:

The Court and the parties estimate that the trial in this case will last approximately two (2) months. Jurors will be paid an attendance fee of \$40.00 per day for the first thirty (30) days of trial, and \$50.00 per day thereafter. You will be reimbursed for mileage expense for use of your private vehicle.

Jury service is one of the highest duties and privileges of a citizen. The participation of people like yourself is essential to the proper administration of justice. The Court recognizes that not everyone can serve on a case of this length. However, mere inconvenience or the usual financial hardships of jury service will not be enough to excuse you. You must show that service in this case would cause an unacceptable amount of personal hardship.

Would you have a serious hardship if chosen for this case?

_____ **YES**, I would have a serious hardship if chosen for this case. Please answer the questions below, and fully explain your hardship. You must still complete the entire questionnaire.

_____ **NO**, I would not have a serious hardship if chosen for this case. Please move onto the next section of the questionnaire.

If **YES**, please explain the hardship, and list your current occupation. Describe the

type of job and business without giving details of your employer's name or address. For example, simply list "receptionist", "business executive", "school teacher" or "self-employed/freelance". If you are retired or unemployed, please indicate that fact and list your previous occupation. Please write legibly.

Occupation: _____ Your Age: _____ Sex: _____

** Please do not list the name of your employer.

Are you self-employed? _____ Are you retired? _____

Will you be paid a salary while you serve jury duty? _____

What is your hardship? _____

What arrangements can you make to alleviate your hardship? _____

1. What is your age? _____

2. Are you: Male _____ Female _____

3. Do you have any problem with your hearing or vision that would make it difficult for you to serve as a juror?

Yes _____ No _____

4. Do you have any medical condition that would make it difficult for you to serve as a juror on this case?

Yes _____ No _____

If Yes, **briefly** list the condition(s):

5. Are you taking any prescription medication or have any other condition that may interfere with your ability to concentrate or serve as a juror in any way?

Yes _____ No _____

6. Is there anything the Court should know about your ability to concentrate for long periods of time?

_____ Yes _____ No _____ I am not sure

Please explain:

7. Have you had any problems or concerns about your ability to remember complex information?

_____ Yes _____ No _____ I am not sure

Please explain:

8. What is your place of birth? (Please list only the **city and state**, and, if outside the United States, the country.) _____

9. Are you (check one):

Married _____

Single _____

Living with another person as a couple _____

Divorced/Separated _____

Widow/Widower _____

(a) What is your racial/ethnic background? _____

(b) If married, what is the racial/ethnic background of your spouse or person with whom you live as a couple? _____

(c) What is your religion? _____

(d) If married, what is the religion of your spouse or person with whom you live as a

couple religion ? _____

10. In what Florida county do you reside? _____

(a) How long have you lived in this area? _____

(b) What other places have you lived? _____

11. Do you read a newspaper regularly (at least two or three times a week)?

Yes _____ No _____

If Yes, list the names of the newspapers you read and indicate how often you read each newspaper.

Name of Newspaper: _____

_____ Once a week

_____ 2-3 times a week

_____ More than 4 times a week

_____ Every day

_____ Sunday Only

12. Do you watch any television newscasts on a regular basis?

Yes _____ No _____

(a) If Yes, which ones? _____

(b) Do you consider the television newscasts you watch to be:

_____ always biased

_____ sometimes biased

_____ not at all biased

Please explain the kind of bias you find and how you feel about that.

13. What, if any, talk shows do you listen to or watch?

14. Do you use the internet as a source of news and information? _____ Yes _____ No

If Yes, which web pages do you view?

15. How would you rate the reliability of information that you find on the internet, on a scale of 1 to 5, with 1 being "not very reliable" and it 5 being "extremely reliable".

1 2 3 4 5

16. Do you have a personal computer at home, or do you have daily access to a personal computer outside your home (e.g. at work, library, etc.)?

_____ Yes, I have a computer at home
_____ Yes, I have daily access outside my home
_____ Yes, both
_____ No

How often do you log onto the internet?

_____ Several times a day
_____ At least once a day
_____ At least two or three days a week
_____ Once a week or less

How much time do you spend on the internet daily?

_____ More than five hours a day
_____ Three to five hours a day
_____ One to three hours a day
_____ Less than one hour per day
_____ Do not spend time on the internet daily

Which of the following activities do you spend the *most* internet time on?

Please check all that apply:

_____ E-mail/Chatting/Instant messaging
_____ Entertainment (games, cards, puzzles)
_____ Shopping/Auctioning
_____ Stock trading
_____ Banking/Paying bills

- ☐ Research/Information gathering
- ☐ Reading the news/Current events
- ☐ Fantasy sports
- ☐ Gambling
- ☐ Downloading music
- ☐ Blogging

☐ Other: **SPECIFY** _____
☐ None

17. Is English your first language? Yes _____ No _____

18(a). Do you have difficulty reading and understand English? Yes _____ No _____

19. What other languages do you speak, read or understand?

20. Are you, your spouse or a former spouse a naturalized U.S. Citizen?

Yes _____ No _____ If Yes, please tell us who and when they became a citizen.

21. Do you speak, read, write or understand Arabic (or any dialect of Arabic) or did you grow up in a household where this language or any dialects were spoken?

Yes _____ No _____

22. Did you ever spend substantial time in a household or other environment where Arabic, any Arabic dialect was spoken, written or read?

☐ Yes, I grew up in, or have spent substantial time in an environment where Arabic/Arabic dialect(s) were spoken, written or read.

☐ No, I did not grow up in and have not spent substantial time in an environment where Arabic or any dialect(s) were spoken, written or read.

23. If you speak, read, or understand any Arabic, (or any of its dialects) would you have any

difficulty relying solely upon a translator's translation of the evidence?

_____ Yes _____ No

23. Are you: ☐ Employed full-time ☐ Retired
 ☐ Employed part-time ☐ Student
 ☐ Homemaker ☐ Disabled & unable to work
 ☐ Unemployed/laid off

(a) Without telling us the name of your employer (or if self-employed), what kind of work do you do? (For example: Electric Utility, maintenance; teacher/high school.)

(b) If retired or unemployed, what was your primary vocation?

(c) If homemaker or student, please tell us what jobs outside the home (if any) you have had in the past year:

24. What is (was) your job title? _____

(a) What are (were) your duties on that job?

(b) Do (did) you supervise others in that job?

Yes _____ No _____ If Yes, how many? _____

25. Do you have a second job?

Yes _____ No _____

If Yes, what do you do? _____

26. What other jobs have you held as an adult?

27. Please tell us the following about your children, stepchildren, foster children and/or grandchildren:

Relationship: _____
Gender: _____
Age: _____
Level of Education: _____
Occupation: _____

Relationship: _____
Gender: _____
Age: _____
Level of Education: _____
Occupation: _____

Relationship: _____
Gender: _____
Age: _____
Level of Education: _____
Occupation: _____

Relationship: _____
Gender: _____
Age: _____
Level of Education: _____
Occupation: _____

Relationship: _____
Gender: _____
Age: _____
Level of Education: _____
Occupation: _____

Relationship: _____
Gender: _____
Age: _____
Level of Education: _____
Occupation: _____

(a) Which of these, if any, presently live with you?

28. If you have ever been married, list your spouse's and/or former spouse's most recent type of work:

29. Parents (or stepparents) occupations: If retired or deceased, what did they do before?

Father: _____

Mother: _____

30. What is the highest grade of schooling you have completed?

- | | |
|---|---|
| <input type="checkbox"/> 8th grade or less | <input type="checkbox"/> Community college |
| <input type="checkbox"/> Some high school | <input type="checkbox"/> Some four-year college |
| <input type="checkbox"/> High school graduate | <input type="checkbox"/> College graduate |
| <input type="checkbox"/> Post graduate | |

(a) Major area(s) of study: _____

(b) Degrees or certificates: _____

31. What civic, social, union, professional, fraternal, political, recreational, churches, synagogues, temples, mosques, or other religious organizations do you belong to or participate in, and what offices, if any, have you held in any of these organizations?

32. (a) Have you ever donated money/goods to, or volunteered to work at, charitable causes or organizations?

Yes _____ No _____ I am not sure _____

- (b) If yes, please list the causes or organizations to which you have donated money/goods or at which you have volunteered.

- (c) Do you give donations or do volunteer work for any charities or organizations that you understand provide aid to people living outside the United States?
Yes ____ No ____.

If yes, what are the name(s) of the charities or organizations? _____

- (d) What countries or regions of the world do these charities or organizations provide aid? _____

- (e) If you donate money to a charitable organization, what if anything do you do to verify how the organization spends that money?

33. Have you ever served in the military? Yes ____ No ____

Branch and highest rank: _____

34. Has your spouse or children ever served in the military? Yes ____ No ____

Branch and highest rank: _____

35. Have you or any children or relatives served in the recent war in Iraq, in Desert Storm or in military operations in Afghanistan and other areas of the Middle East?

Iraq: Yes ____ No ____ Branch and highest rank: _____

Desert Storm: Yes ____ No ____ Branch and highest rank: _____

Afghanistan: Yes ____ No ____ Branch and highest rank: _____

Other areas of the Middle East:

Yes ____ No ____ Location: _____

Branch and highest rank: _____

If Yes, where is, or was that person stationed?

36. Were any such persons ever in a combat situation?

Yes ____ No ____ Don't Know ____

If Yes, please tell us where and when:

- (a) Have you, a family member, close friend or acquaintance been injured or killed while serving in a combat or military zone?

Yes_____ No_____

37. In what contexts have you had personal contact with people who are Muslims, Palestinian, Egyptian, Puerto Rican, or Arab descent? (Please check all answers that apply.)

_____ in the family

_____ in the neighborhood

_____ in organizations

_____ through work/business

_____ in place of worship

_____ in school

_____ none

_____ other: _____

38. Have you had any unpleasant experiences with Muslims, Palestinians, Egyptians, Puerto Ricans, or persons of Arab descent?

Yes _____ No _____ If Yes, please explain:

39. Have you or any member of your family or friends had any experience which would cause you to be biased against a Muslim defendant in a case where there are allegations of giving support for people and/or organizations who agreed to commit murder, kidnaping, and maiming in foreign countries?

Yes _____ No _____ If Yes, please explain: ,

40. Would you feel biased against a Muslim defendant in a case where there are allegations of giving support to an organization that the government designated as a terrorist organization after September 11, 2001?

41. Have you had any pleasant experiences with Muslims, Palestinians, Puerto Ricans, or Arabs?
_____ Yes _____ No _____ I am not sure

If "Yes" or "I am not sure," please explain:

42. Do you feel that any of your experiences with Muslims, Palestinians, Puerto Ricans, or Arabs, or associated organizations, would cause you to be biased against a Muslim, or Arab defendant in a case involving a Muslim, or Arab defendant?

_____ Yes _____ No _____ I am not sure

If "Yes" or "I am not sure," please explain:

43. Do you believe that Muslims, Palestinians, Arabs, or Puerto Ricans are disproportionately more violent than other religious or ethnic groups?

Yes _____ No _____ If Yes, what gives you that impression?

44. Do you believe that Muslims, Palestinians, Arabs, or Puerto Ricans commit disproportionately more crimes than other ethnic groups?

Yes _____ No _____ If Yes, what gives you that impression?

45. Do you have any experiences or feelings about Arabs or Muslims that would make it difficult for you to listen to the evidence and decide the case with an open mind, when the case involves Arab or Muslim men charged with giving support for people and/or organizations who, allegedly, agreed to commit murder, kidnapping, and maiming in foreign countries?

Yes _____ No _____ If Yes, please explain:

46. Do you think that Palestinians were responsible for the attack on the United States on

September 11, 2001?

Yes _____ No _____ Don't know _____ If Yes, please explain:

47. Do you or does any relative or close friend know or have any connection with any of the defendants?

Adham Amin Hassoun:

Yes _____ No _____

Kifah Wael Jayyousia:

Yes _____ No _____

Jose Padilla:

Yes _____ No _____

- (a) Please explain in detail who has the connection and the nature of the connection for each individual:

- (b) Have you seen, heard or read anything about any of the defendants? This includes not only the media, but anything you may have heard from friends, relatives, or co-workers.

Yes _____ No _____

- (c) What have you seen, heard or read?

48. Several individuals have been charged in the indictment in this case but will not be defendants in this trial. Do you or anyone in you family know or have you heard of any of these individuals?

Mohamed Hesham Youssef:

Yes _____ No _____

Kassem Daher:

Yes _____ No _____

- (a) Have you seen, heard or read anything about any of the defendants? This includes not only the media, but anything you may have heard from friends, relatives, or co-workers.

Yes_____ No_____

(b) What have you seen, heard or read?

49. Have you, or has anyone close to you, seen, heard, or read anything about this case, or any of the defendants in this case, or have you discussed this case or these individuals with anyone?

_____ Yes,
_____ No

If yes, please explain what information you have or have heard, the source of the information, and with whom you may have discussed the case and what was discussed.

What were your reactions, thoughts, feelings or impressions about what you saw, heard, read or discussed?

50. Have you formed any opinion about this case or about the defendants in this case: Adham Amin Hassoun, Mohamed Hesham Youssef, Kifah Wael Jayyousia, Kassem Daher, or Jose Padilla?

_____ Yes _____ No _____ I am not sure

If "Yes" or "I am not sure," please explain:

51. Have you, or has anyone close to you, seen, heard, or read anything about other federal litigation involving Jose Padilla, which was ongoing from May, 2002 through March 2006, or have you discussed the prior litigation with anyone?

_____ Yes, self
_____ Yes, someone close

_____ No

IF “NO,” SKIP SUBSECTIONS (a) - (e).

- (a) What do you believe was the result of the litigation?

- (b) Please explain what information you have or have heard, the source of the information, and with whom you may have discussed the case and what was discussed.

- (c) What were your reactions, thoughts, feelings or impressions about what you saw, heard, read or discussed?

- (d) Have you formed any opinion about any aspect of the prior federal litigation (e.g., the attorneys, the Court, the evidence, etc)?

_____ Yes _____ No _____ I am not sure

If “Yes” or “I am not sure,” please explain:

- (e) What was your reaction to the court decision?

52. Have you heard or read about any statements attributable to Adham Amin Hassoun?

Yes _____ No _____

What were your reactions or impressions based on what you read or heard?

53. Have you heard or read about any statements attributable to Mohamed Hesham Youssef?

Yes _____ No _____

What were your reactions or impressions based on what you read or heard?

54. Have you heard or read about any statements attributable to Kifah Wael Jayyousi?

Yes _____ No _____

(a) What were your reactions or impressions based on what you read or heard?

55. Have you heard or read about any statements attributable to Kassem Daher?

Yes _____ No _____

(a) What were your reactions or impressions based on what you read or heard?

56. Have you heard or read about any statements attributable to Jose Padilla?

Yes _____ No _____

(a) What were your reactions or impressions based on what you read or heard?

57. Have you seen, heard, or read anything about Sheik Omar Abdel Rahman, ("Blind Sheik").

Yes _____ No _____ Maybe _____

If yes or maybe, please explain what information you have or have heard, the source of the information.

What were your reactions, impressions and thoughts about what you saw, heard, read or discussed about this person?

58. If you hear an allegation that any one of the defendants supported or sympathized with Sheik Omar Abdel Rahman would you be biased for or against that particular defendant?

Biased _____ No bias _____

If biased, please explain _____

59. Have you seen, heard, or read anything about Mohamed Zaky ? Yes _____ No _____. If yes, please explain what information you have heard and the source of the information.

60. Is there anything you have seen, heard, or read about that would interfere with your ability to render a fair verdict in this case based solely on the evidence presented in court?

Yes _____ No _____

61. Have you formed an opinion as to the innocence or guilt of any of the defendants in this case before hearing the evidence?

_____ Guilty

_____ Innocent

_____ No decision

Please explain what led to your position:

62. This case is likely to receive ongoing media attention. The Court wants to make sure that this case is decided solely on the evidence in the courtroom and not based on things that are said outside the courtroom. Accordingly, the Court will be instructing you periodically that you must avoid reading about the case in the newspapers or on the internet, or listening to any radio or television reports about the case. The Court will also instruct you periodically that you must avoid discussing this case with friends or family during the course of the trial.

Would these requirements pose any difficulty for you?

Yes _____ No _____

63. How closely have you followed the media coverage of the criminal and other legal cases involving cases of Arab or Muslim men charged with giving support for people and/or organizations who, it is alleged, agreed to commit murder, kidnapping, and maiming in foreign countries?

Very closely _____
Somewhat closely _____
Not too closely _____

(a) Which cases? _____

(b) If you have followed the media coverage of these cases, based on what you have heard or read, have you formed any opinions and beliefs about the nature of those cases?

Yes _____ No _____

If you answered "Yes" to (a) or (b), please explain:

(c) Would this opinion make it difficult for you to sit as a fair and impartial juror in this type of case?

Yes _____ No _____ I am not sure _____

64. How closely have you followed the media coverage of the events that took place in the following countries over the past ten years:

Bosnia or Bosnia-Herzegovina Yes _____ No _____

Kosova Yes _____ No _____

Chechnya Yes _____ No _____

(a) If yes, how closely did you follow the media coverage of these areas?

| | Very close | somewhat close | none at all |
|------------------------------|------------|----------------|-------------|
| Bosnia or Bosnia-Herzegovina | _____ | _____ | _____ |
| Chechnya | _____ | _____ | _____ |
| Kosova | _____ | _____ | _____ |

- (b) If you have followed the media coverage of the events, based on what you have heard or read, have you formed an opinion about the nature of the events in these areas.

Yes_____ No_____ Maybe_____

If yes or maybe, please explain what your opinion is for each of the following for which you have an opinion:

(a) Bosnia-Herzegovina:_____

(b) Kosova_____

(c) Chechnya_____

65. Are you familiar with any past events in these countries that have affected the Muslim people living in these three countries?

Very familiar_____ Somewhat familiar _____ Not at all familiar_____

If so, what are you are what have you heard and what opinion if any do you have about the nature of past events in these countries?

66. How closely have you followed the media coverage of the events that took place in the following countries over the past ten years:

| | Very close | somewhat close | none at all |
|-------------|------------|----------------|-------------|
| Afghanistan | _____ | _____ | _____ |
| Algeria | _____ | _____ | _____ |
| Somalia | _____ | _____ | _____ |
| Libya | _____ | _____ | _____ |

Have you formed an opinion about the events in any of these places?

Yes_____ No_____ Maybe_____

If your answer is yes or maybe, please explain your answer as to each country.

Afghanistan _____

Algeria_____

Somalia_____

Libya_____

67 Do you have an opinion about the words “jihad” or “violent jihad?”

Yes_____ No_____ Maybe_____

If you answer yes or maybe, please explain what you understand these words means.

68 Do you have an opinion about the word “mujahideen?”

Yes_____ No_____ Maybe_____

If you answer yes or maybe, please explain what you understand this word means.

69. Do you have an opinion about the words “Islamic” or “radical Islamic fundamentalist?”

Yes_____ No_____ Maybe_____

If you answer yes or maybe, please explain what you understand it to mean?

70. Do you have any bias against a Muslim who is a strong believer in this faith.

Yes_____ No_____ Maybe_____

If you answer yes or maybe, please explain.

Do you have an opinion about the words “sharia” or “salafist”

Yes_____ No_____ Maybe_____

If you answer yes or maybe, please explain what you understand it to mean?

-
71. Do you believe that a person who follows the Islamic religion is a violent person?
72. Have you ever heard of the following groups? If yes, explain what you have heard and how you are familiar with the group.
- Holy Land: Yes___ No___ explain_____
- Global relief Yes___ No___ explain_____
- American Worldwide Relief Organization Yes___ No___ explain_____
- _____
- Canadian Islamic Association Yes___ No___ explain_____
- Save Bosnia Now Yes___ No___ explain_____
- Islamic Center of the Americas Yes___ No___ explain_____
- American Islamic Group Yes___ No___ explain_____
73. Have you or anyone close to you ever had an experience of being interviewed by the police, the FBI, or any other law enforcement agency?
- Yes _____ No _____
- If yes, what was the nature of the interview and what was the outcome? _____
- _____
74. Have you or anyone close to you ever been accused of giving false information to law enforcement?
- Yes_____ No_____. If yes, please explain the nature of the accusation by the law enforcement agency and the outcome._____
- _____
- 75 Have you or anyone close to you ever been accused of giving false testimony under oath in

any deposition, trial, hearing, or other type of judicial proceeding?

Yes_____ No_____. If yes please explain the nature of the judicial proceeding, the nature of the accusations and the outcome. _____

76. Have you ever served on a jury? _____ Yes _____ No

_____ Civil Date(s): _____
Nature of case(s): _____

_____ Criminal Date(s): _____
Nature of case(s): _____

_____ Grand Jury Date(s): _____
Nature of case(s): _____

(a) If Yes, did the jury reach a verdict? _____

(b) Was there anything about your jury experience that would make it difficult to serve again?

Yes _____ No _____ If Yes, please explain:

77. Have you or anyone close to you worked for, applied to or had training with one of the following? (check all that apply)

- _____ a. Any law enforcement, security or investigative agency, including but not limited to the FBI, CIA, INS, NSA, DOD, Department of Homeland Security and the Department of Justice?
- _____ b. A prison, jail, detention center or probation services?
- _____ c. Any city or town attorney, Attorney General, state or federal prosecutor, or court?
- _____ d. Any law firm that practices criminal defense?
- _____ e. Any accounting, banking, financial institutions?
- _____ f. Any newspaper, radio, television, or other media outlet?

If "Yes" to any of the above, please state who (relation to you), where, when and circumstances.

78. Have you or anyone close to you ever worked in an effort to change a law or the enforcement of a law?

Yes _____ No _____ If Yes, please briefly describe that effort and your level of participation:

79. Have you or a member of your family had any legal action, dispute or negative experience with the United States or any of its agencies, or any officer, agents or employees of the United States?

Yes _____ No _____

If Yes, please explain the nature of your interest in such proceedings:

80. Are you a vendor or a contractor for the United States Government or do you work for one?

Yes _____ No _____

81. Not all of the defendants are citizens of the United States. Would you afford each of the defendants the same consideration?

Yes _____ No _____

82. What are your feelings about the criminal justice system?

83. Do you believe that you, a member of your family, or a close friend, has ever been directly or indirectly affected in any way by a terrorist act or threat?

Yes _____ No _____

If Yes, please explain the event:

84. Have you or any family members or close friends had any personal experience with acts of terrorism?

Yes _____ No _____ If Yes, please explain:

85. Have you or has a family member or close friend ever been the victim of an act of violence (or abuse), reported or not?

Yes _____ No _____ If Yes, please explain who (relation to you) and circumstances.

Was there an arrest? Yes _____ No _____

What was the outcome?

86. Have you, or has anyone close to you, been discriminated against in any way?

_____ Yes, self

_____ Yes, someone close

_____ No

Was the discrimination on the basis of:

Please check all that apply

_____ Age

_____ Disability

_____ Ethnicity

_____ Gender

_____ Marital status

_____ Race

_____ Religious beliefs

_____ Socio-economic status

_____ Other: **SPECIFY** _____

- (d) Do you think that your experiences with discrimination or your views on discrimination would affect your ability to be fair and impartial in this case?

_____ Yes _____ No _____ I am not sure

Please explain: _____

- 87 (a) Do you think that discrimination happens in the United States:

_____ All the time
_____ Some of the time
_____ Not often
_____ Never

- (b) Do you think that groups that have been victimized or discriminated against should have the same rights as other groups under the law?

_____ Yes _____ No _____ I am not sure

- 88 Have you or anyone close to you ever been arrested, charged or convicted for a crime other than a traffic ticket?

Yes _____ No _____

If Yes, please explain who (relation to you), when, nature of the charge and circumstances:

89. Have you or has a family member or close friend ever been falsely accused of a crime?

Yes _____ No _____ If Yes, please explain:

- (a) Were you satisfied with the outcome? Please explain:

89. Do you believe that the protections of free speech in a democracy extend both to citizens and

non-citizens?

Yes _____ No _____ If not, please explain:

90. Can a person criticize the United States government and still be patriotic?

Yes _____ No _____ Please explain:

91. Under the United States Constitution, a person accused of a crime does not have to testify in his defense, and his silence may not be used against him. What are your feelings about that?

92. If a person does not tell his side of the story, do you feel he is more likely guilty?

Yes _____ No _____ Why or why not?

93. There may be evidence in this case consisting of tape recordings of conversations taking place over the telephone through the use of electronic devices commonly known as "wiretaps." Before received in evidence, the Court will have ruled that this evidence is lawfully before you and you may give it the weight you deem appropriate.

How do you feel about electronic surveillance of private conversations?

(a) Do you feel that electronic surveillance of private conversations is an invasion of privacy that should never happen regardless of the circumstances?

_____ Yes _____ No _____ I'm not sure

94. There may also be evidence obtained from photographic and physical surveillance as well as evidence seized pursuant to lawful searches of various places, including the homes of some of the defendants. How do you feel about surveillance or searches of private property?

- (a) Do you feel that surveillance or searches of private property is an invasion of privacy that should never happen regardless of circumstances?

_____ Yes _____ No _____ I'm not sure

Explain:

95. Some of the evidence that you will hear about in this case is more than ten years old. Which of the following statements describes your views on older evidence:

_____ Older evidence is always less reliable than more recent evidence.
_____ Older evidence is sometimes less reliable than more recent evidence.
_____ Older evidence is as reliable as more recent evidence.
_____ Older evidence is sometimes more reliable than more recent evidence.
_____ Older evidence is always more reliable than more recent evidence.

Explain:

96. At the conclusion of the case it is the Court's task and duty to charge you on the law and explain to you the elements of the crimes charged in the indictment. Do you have personal, religious, philosophical or other beliefs as to what the law is or should be that would make it difficult for you to follow the instructions of the Court?

Yes _____ No _____

97. Is there anything about the nature of the charges in this case that would affect your ability to fairly evaluate the evidence regarding whether or not the government has proven the guilt of the defendants beyond a reasonable doubt?

Yes _____ No _____

If Yes, please explain:

98. Is there any reason that you could not be completely fair and impartial to the defendants in this case?

Yes _____ No _____

99. Is there any reason that you could not be completely fair and impartial to the Government in this case?

Yes _____ No _____

If you answered either of the two previous questions "Yes," please explain:

100. Do you or does any relative or close friend know or have any connection with any of the following defense lawyers or their staff?

| | |
|------------------|--------------|
| Jeanne Baker | Yes___ No___ |
| Orlando do Campo | Yes___ No___ |
| Michael Caruso | Yes___ No___ |
| Anthony Natale | Yes___ No___ |
| Andrew Patel | Yes___ No___ |
| Kenneth Swartz | Yes___ No___ |
| William Swor | Yes___ No___ |

If you answered yes to any of the above, describe your connection to this individual.

101. Have you consulted with anyone in completing this questionnaire?

Yes_____ No _____

102. Would you like to discuss or explain further any of your answers to the Court?

Yes _____ No _____